Satisfactory Academic Progress
for Title IV Eligibility

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Satisfactory Academic Progress

668.34 (a) Satisfactory Academic Progress policy

An institution must establish a reasonable satisfactory academic progress policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program and may receive assistance under the Title IV, HEA programs.

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SAP Standards

- Reasonable
- Consistently applied
- Applies to all Title IV programs
  - If not meeting SAP, not eligible for any TIV program
  - Cannot say eligible for Pell but not eligible for Loans
- "ED provides the outline; schools fill in the details"
  - Schools have a lot of flexibility

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"As Strict or Stricter"

- Having an SAP policy "as strict or stricter" then other school policies refers to the *actual measurements* used to monitor qualitative and quantitative standards - GPA and pace of progression

- It does NOT refer to the frequency in which the school checks SAP

  - Therefore academics might check GPA every term but financial aid can check GPA for SAP purposes annually

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Policy Q & A* - Different Policies

SAP-Q9: Is an institution required to use the same SAP policy for all students?

SAP-A9: No, the policy must explain the qualitative (grade-based) and quantitative (time-related) standards the institution uses to check SAP; however, an institution is permitted to establish different SAP standards for different programs or categories (e.g., full-time, part-time, undergraduate, and graduate students) which must be applied consistently to students in that category or program.

- Please note that this does NOT allow different policies for subsets of students (e.g., veterans, athletes, females, etc.)

*Program Integrity Q & A website – upper right-hand corner of ifap.ed.gov

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SAP Evaluation Items

- At each formal SAP evaluation point, a school checks:
    1. Qualitative measure (grade-based)
        - Remedial coursework qualitative measure may be part of or separate from regular qualitative measure
        - Qualitative measure for programs greater than 2 years
    2. Quantitative measure (pace of progression)
    3. Maximum timeframe

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SAP Policy – Other Key Items

Policy must include the following -

- Describe how student's SAP is affected by:
  - *Incompletes*
  - *Withdrawals*
    - Cannot exclude "Ws" earned passed the add/drop period
  - *Repetitions*
    - School decides how repeat coursework impact qualitative and quantitative measures
  - *Transfers of credits*
    - Transfer credits accepted toward completion of student's program <u>must</u> count as both hours attempted and hours completed

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Policy Q & A – Non-Accepted Credits

SAP-Q6: SAP regulations require credit-hours accepted toward student's program count as both attempted and completed when calculating pace for SAP. Can an institution's policy include *non-accepted credits* as attempted credits for purposes of these calculations?

SAP-A6: Yes. The treatment of these credits would be up to the institution. The SAP regulations do not address non-accepted credits.

- May refer to transfer credits or credits earned in other academic programs at your school

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Qualitative Measure

Definition: To assess quality of academic work using standards measureable against a norm

- – Grades; work projects; etc.
- Must be <u>cumulative</u>
- May use a graduated or fixed standard
- Can be more restrictive and have payment period measurements in addition to cumulative measures

  – Could have an overall cumulative program or school GPA and a semester GPA requirement

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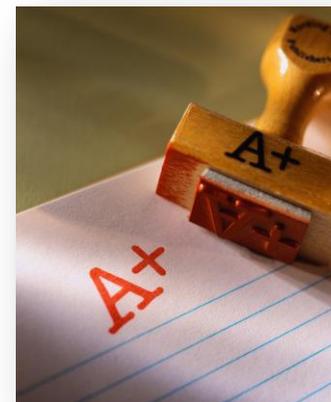
Policy Q & A - Remedial

- SAP-Q3: How are remedial courses treated for SAP purposes?

- SAP-A3: The institution's SAP policy should describe how remedial courses are treated. An institution <u>may, but is not required to, include remedial coursework in determining pace</u>. However, the school <u>must evaluate remedial coursework under the qualitative factor</u>, though it does not have to be part of the GPA. If not part of the GPA, the school must have some other measurement process to evaluate remedial coursework (passing courses, meeting course requirements, etc.).

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Policy Q & A – Programs > 2 yrs

R-Q2: How does the qualitative portion of a SAP review relate to the requirement for a student to have a GPA of at least 2.0, or academic standing consistent with the institution's requirements for graduation?

R-A2: …the Higher Education Act requires a specific qualitative review at the end of the student's second academic year. In this context, we have interpreted the "second academic year" as the student being at the school for 4 semesters or 6 quarters, regardless of a student's enrollment status. At that point, the student must have a GPA of at least a 2.0 or its equivalent or have academic standing consistent with the institution's graduation requirements.

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Quantitative Measure

Definition: To measure progress toward program completion

- Must be <u>cumulative</u>

- May use a graduated or fixed standard

- Can be more restrictive and have payment period measurements in addition to cumulative measures

  - Could have an overall cumulative completion pace and a semester completion requirement

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Quantitative Measure

- *Pace of progression* required to make sure student completes within maximum timeframe
- Calculate pace at which the student is progressing by
  - Dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted:

    Cumulative hours completed

    Cumulative hours attempted

  - Clock-hours - evaluate cumulative clock- hours required to complete as expressed in calendar time (weeks, etc.)

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Quantitative Measure

- School may use standard rounding rules when calculating percentages under the quantitative measurement

    - Clock-hour or credit-hour programs
    - Example – 66.5% could be rounded up to 67%

- Rounding is optional within SAP policy

- Program integrity Q & A website under the SAP topic, question R-Q9 (clock-hour example)

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Maximum Timeframe

- Limits of Maximum Timeframe
  - For undergraduate programs, must be no longer than 150% of published length of educational program
  - For graduate programs of study, school defines the maximum based upon length of program

- Example:
  - Degree program requires 120 credits for completion
  - 120 x 150% = 180 attempted credits is maximum timeframe

- Quantitative measure (tied to max timeframe)
  - 120 credits / 180 credits = 66.6% (usually rounded to 67%)
  - Student must earn 67% of credit-hours attempted

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Maximum Timeframe

- Must be measured at each evaluation point
  - Student is ineligible at the evaluation point where indicated will exceed max timeframe NOT at the point when they actually reach the max timeframe

- Example
    - At end of payment period (SAP evaluation checkpoint) student has attempted 160 credit-hours out of a possible 180 credit-hours allowed under max timeframe but has 25 hours left to earn to complete his degree
    - Student is not meeting SAP due to exceeding the max timeframe because he has more hours to earn than what is allowed to graduate within the maximum timeframe

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Checking SAP

- Student's SAP evaluations, whether each payment period, annually or less often than each payment period, must occur at the <u>end</u> of a payment period
  - *Official evaluation period cannot be less than a payment period*

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SAP – Clock-Hours

- Evaluation "at end of payment period"

  - Schools have 3 options

  1) At the point when the student's *scheduled clock- hours* for the payment period have elapsed, regardless of whether the student attended them; or

  2) At the point when the student has *attended* the scheduled clock-hours; or

  3) At the point when the student *successfully completes* the scheduled clock-hours for that payment period

  Program Integrity Q & A website – SAP Question R-Q9

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SAP (Non-term Credit-Hours)

- Evaluation "at end of payment period"

  - Schools have 2 options

  1) On the date when the student was scheduled to earn the credit-hours; or

  2) When the student successfully earns the credit-hours

School must establish one review option for a program; cannot start with one option and then after the first review, switch to a different option for that cohort of students.

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How Often is SAP Evaluated?

- Frequency of evaluation determines options
  - School must evaluate SAP at end of each payment period for programs of study that are *one academic year or less in length*
  - For programs of study *longer than one academic year*
    - School must evaluate at least annually to correspond with end of a payment period
      – At least once every 12 months
    - School may evaluate at end of each payment period

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SAP Evaluations

- Each official evaluation must include evaluation of the qualitative (grade-based), quantitative (time-related) and maximum timeframe standards

- Warning and probation statuses only last for one payment period, no matter how frequently SAP is evaluated

- "Warning "and "probation" must have the same definitions as described in regulation

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Warning Period

- For an institution that chooses to <u>evaluate SAP at the end of EACH payment period</u>, a "financial aid warning" status *may* be used (optional)
  - Student may continue to receive Title IV aid for ***one payment period***
  - No appeal necessary

  Note: Possible for student to receive more than one warning period during academic career just NOT consecutively

Probation

- To be placed on Probation, a student must:
  - Appeal and have it approved by the school; AND
  - Student expected to be making SAP in next payment period; *OR*
  - Be successfully following an academic plan designed to ensure student will be able to *meet SAP by a specific point in time*
    - Not required to develop academic plans
    - Can set conditions on developing plans
    - ED does not define what office(s) must develop and oversee

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Probation

- A student on Probation may only receive Title IV funds for **ONE payment period**

- A student on Probation may not receive Title IV funds for the subsequent payment period UNLESS:

  - Student is now making SAP; or

  - Institution determines student met requirements specified by the school in the academic plan and student still covered by academic plan

- SAP must be checked at the end of the probationary payment period (even if SAP is normally checked annually)

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Policy Q & A – Academic Plans

ACP-Q2: What is the status of a student who has completed the probationary payment period and who is continuing to receive aid by *meeting the requirements of the student's academic plan*?

ACP-A2: A student who has been reinstated to eligibility under an academic plan and is making progress under that plan is considered to be an eligible student.

- May be evaluated at the same time as other TIV recipients or at more frequent periods based on plan

Policy Q & A – Academic Plans

ACP-Q4: Must the academic plan be mathematically set to graduate student within 150% timeframe?

ACP-A4: The academic plan must be designed to ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time. In some cases, this *could mean that the maximum timeframe would be extended based on the student's approved appeal*.

10/29/10 Federal Register reminds schools that 150% maximum timeframe can be appealed

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Policy Q & A - Probation

PROB-Q4: How many times may a student be placed on probation for failing to meet SAP standards?

PROB-A4: A student may be placed on probation for one payment period per appeal. It is possible that a student could be placed on probation more than once in his or her academic career.

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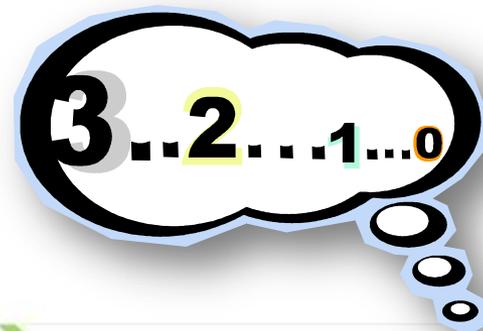
Appeals

- Appeals
  - Process by which student who is not meeting school's SAP policy petitions for reconsideration of eligibility for Title IV
  - Must specify conditions under which student may appeal
    - Student may appeal due to special or mitigating circumstances, such as injury, illness, family death, etc.
    - Appeal must include:
      - Why the student failed to make SAP; AND
      - What has changed that will allow the student to make SAP at the next evaluation
  - ED does not define what office must oversee appeals or how appeals are reviewed (individuals, committees, etc.)

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Appeal Notification

- Notification to students
  - Must notify student of results of SAP review that impacts student's eligibility for Title IV aid
  - If institution has an appeal process, must describe the specific elements required to appeal SAP
    - May specify <u>how many appeals </u>are allowed
  - Regardless as to whether or not you have an appeal process, you must always describe how a student who has failed SAP can reestablish eligibility for Title IV aid

NOTE: There is no regulatory requirement for a school to notify nonTIV students of their eligibility for Title IV aid

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Policy Q & A - Amnesty

APP-Q4: May an institution's SAP policy include automatic "academic amnesty" in certain circumstances, such as, after a student has not attended for a certain number of payment periods or years?

APP-A4: No. The regulations permit use of the automatic financial aid warning status for institutions that review SAP at each payment period. No other status may be granted automatically. <u>A successful appeal is needed to grant financial aid probation status or to develop an academic plan.</u>

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Additional SAP Guidance

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Resources

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Policy Guidance – Prior Periods

Question: For a school that checks SAP at the end of each payment period, if a student is not receiving Title IV aid for their first 3 semesters (never applied for aid) but does so poorly in each of the semesters that cumulatively he is not making SAP after each semester, if he later applies for Title IV aid has his warning period already elapsed?

Answer: Yes. The student would be suspended from TIV aid and would only be eligible for TIV aid if an appeal was approved for probation. Past periods not making SAP, whether receiving aid or not, can and does impact TIV eligibility in future terms.

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Policy Guidance – Pass/Fail Courses

- <u>Question</u>: Does a school have to factor in Pass/Fail classes, that are part of the student's program of study, as part of the school's qualitative measure (GPA)?

- <u>Answer</u>: No, the school does not have to factor in those limited classes a student takes as Pass/Fail into the GPA measurement as long as the course is factored into the quantitative measurement (pace of progression).

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Policy Guidance – Academic Plans

- Question: The regulations indicate that an academic plan must be designed for a student to meet SAP by a specific point in time. How do we define a future point in time?

- Answer: Where applicable a date should be used. If a date cannot be confirmed then a school should use some kind of defined end-point – after the 3rd semester, anticipated graduation date, etc. If the graduation point is after the 150% max timeframe, the graduation point should be indicated in some format. It cannot simply be an open-ended process; needs to be a finite point.

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Policy Guidance – Regaining Eligibility

- Question: What happens if a student is on an academic plan and at the end of the payment period they are not meeting the plan requirements but are now meeting the general SAP standards?

- Answer: Once a student is meeting the general SAP standards at a checkpoint, regardless of the plan, they are now in good standing (main point of the plan is to help the student meet the SAP standards). A school may want to indicate in a plan that a student can continue receiving TIV aid if they meet the plan criteria or meet all general SAP standards.

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Policy Guidance – Transcripts

- Question: In reviewing transcripts, what happens if a transcript comes in during a semester? When would the transfer hours impact SAP?

- Answer: The transfer hours on the transcript that could count in SAP would be factored in at the next scheduled SAP check point.

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Resources/References

- FSA Assessments, Student Eligibility section:

  - http://ifap.ed.gov/qahome/qaassessments/studentelig.html

- 668.16, 668.34 (SAP)

- FSA Handbook Vol. 1, Chapter 1

- Electronic Announcement - September 2, 2011

  - Policy Q & A Webpage on program integrity regulations

  - http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html

  - Upper right-hand side of IFAP

  - Topic – "Satisfactory Academic Progress"

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Questions?

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